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July 31, 2025

Hon. Joseph A. Marutollo  
United States Magistrate Judge  
By Electronic Filing

RE: *ATC Healthcare Services, LLC v. Vibra Healthcare, LLC et al.*  
United States District Court for the Eastern District of New York  
Case No. 1:25-CV-02641-LDH-JAM

Your Honor:

Plaintiff ATC Healthcare Services, LLC submits this letter in relation to the Court's minute entry of July 11, 2025. The minute entry acknowledged the parties' joint status report, and imposed a deadline of August 4, 2025, within which to file a stipulation of dismissal.

As with the parties' prior letter filings, and to avoid any issues implicating the unauthorized practice of law by Defendants' counsel, the parties have agreed that undersigned counsel will file this letter on behalf of Plaintiff. It was submitted to Defendants' counsel for review and approval before filing.

The parties have worked diligently to meet the Court's deadline, and complete drafts of the relevant settlement documents have been exchanged. However, these discussions do take time, and counsel do not believe the parties will meet this deadline. No unusual complications have arisen – the parties are simply navigating the usual sort of settlement documentation, and everything seems to be on track. If the Court is willing to grant a brief extension, counsel believe this can be wrapped up before the end of August.

Therefore, Plaintiff – on its own behalf and that of Defendants – respectfully requests an extension of the deadline imposed in the Court's July 11, 2025 minute entry.

Thank you for your consideration.

Very truly yours,

HENDERSON, COVINGTON, MESSENGER,  
NEWMAN & THOMAS CO., L.P.A.



J. Michael Thompson

cc: Douglas C. Yohe, Esq.